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February 4, 2022

By ECF

Honorable Ronnie Abrams
U.S. District Judge
Southern District of New York
40 Foley Square
New York, N.Y. 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
February 4, 2022

**Re: United States v. Angela Rodriguez
20 Cr. 39 (RA)
Request to Travel**

Dear Judge Abrams,

I represent Angela Rodriguez in the above-referenced matter. Ms. Rodriguez has been participating meaningfully in the Court's Young Adult Opportunity Program since October 5, 2021. I write now on her behalf seeking permission to travel.

Bail in this matter was set by Magistrate Judge Katharine H. Parker on November 14, 2019. As a condition of her bail, Ms. Rodriguez's travel is limited to the Southern and Eastern Districts of New York. Ms. Rodriguez would like to take a short trip with her daughter to San Juan, Puerto Rico from February 14, 2022, to February 17, 2022.¹

Frankly, this case has been pending for some time now and a short vacation may be beneficial to Ms. Rodriguez's mental well-being and health. Defense counsel has spoken to A.U.S.A. Samuel Rothchild who has kindly consented to Ms. Rodriguez's travel request. I have also spoken with Pretrial Services Officer Dayshawn Bostic who takes no position and defers to Mr. Rothchild and the Court.

Accordingly, and assuming that Ms. Rodriguez is otherwise in good standing with YAOP and that her travel does not conflict with her YAOP responsibilities in any way, the defense respectfully asks that the Court grant Ms. Rodriguez's request.

Thank you.

¹ Should the Court grant this request, Ms. Rodriguez will provide more specific address and flight information to Pretrial Services before she leaves. Also, because Ms. Rodriguez's flight may leave from Newark Airport, the defense seeks permission for Ms. Rodriguez to travel to the District of New Jersey as well.

Respectfully submitted,

/s/ Matthew J. Kluger

Matthew J. Kluger, Esq.

Attorney for Angela Rodriguez

cc: PTSO Dayshawn Bostic
AUSA Samuel P. Rothschild